

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA

* * * * *

BENEZET CONSULTING, LLC *

and TRENTON POOL, *

Plaintiffs * Case No.

vs. * 1:16-CV-0074

PEDRO A. CORTES and *

JONATHAN MARKS, *

Defendants *

* * * * *

TELEPHONE DEPOSITION OF
MIKE JENNINGS
September 29, 2016

ORIGINAL

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TELEPHONE DEPOSITION

OF

MIKE JENNINGS, taken on behalf of the Defendants
herein, pursuant to the Rules of Civil Procedure, taken
before me, the undersigned, Bernadette M. Black, a
Court Reporter and Notary Public in and for the
Commonwealth of Pennsylvania, at the offices of
Attorney General, 15th Floor, Strawberry Square,
Harrisburg, Pennsylvania, on Thursday, September 29,
2016 beginning at 2:30 p.m.

A P P E A R A N C E S

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I N D E X

WITNESS: MIKE JENNINGS

DIRECT EXAMINATION

By Attorney Joel

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CROSS EXAMINATION

By Attorney Rossi

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CERTIFICATE

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EXHIBIT PAGE

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NUMBER DESCRIPTION

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P R O C E E D I N G S

MIKE JENNINGS, HAVING FIRST BEEN DULY SWORN, TESTIFIED
AS FOLLOWS:

DIRECT EXAMINATION

BY ATTORNEY JOEL:

Q. Can you hear us okay here?

A. It's a little bit muffled, but I can hear you
okay.

Q. All right. Mr. Jennings, as I said, my name is
Kenneth Joel. I'm with the office of Attorney General.
I'm here with my colleague Nicole Radziewicz and we
represent the Defendants in this case. Have you ever
been deposed before?

A. So you said have I ever been what before?

Q. Have you ever been deposed before?

A. This is my first time, so, no.

Q. Let me give you some instructions and ground rules
and it will make this go a lot smoother. First of all,
if you could try your hardest to wait for me to finish
my question and I will try my hardest to wait for you
to finish your answer. Is that okay?

A. That's fine.

Q. Please answer everything verbally. That includes

1 staying away from the uh-huh or uh-uhs. Yes, no,
2 whatever the answer, is fine. But just make sure it's
3 in words; okay?

4 A. That's okay. That's fine.

5 Q. If at any point you don't hear me, just ask me to
6 repeat the question. I would be happy to do so; okay?

7 A. Okay.

8 Q. And if at any point you don't understand a
9 question, tell me what your confusion is and I will
10 rephrase it so you understand it; all right?

11 A. Okay.

12 Q. Can we agree, then, that if you do answer, you
13 have heard me, understood me, and answered truthfully
14 to the best of your knowledge?

15 A. Yes. We can agree on that.

16 Q. Are you on medication or for any other reason that
17 you wouldn't be able to hear me or understand me or
18 answer truthfully?

19 A. No. I'm not on medication. I can hear you,
20 truthfully. Yes.

21 Q. Very good All right. Can you please state your
22 full name?

23 A. My name is Michael, middle name Elmer, my last
24 name is Jennings, J-E-N-N-I-N-G-S.

25 Q. Could you repeat the middle name, please?

1 A. Middle name is Elmer.

2 Q. Elmer.

3 A. Elmer.

4 Q. Thank you.

5 A. Yes.

6 Q. What's your address?

7 A. My mailing address is 111 West 7th Street. That's
8 apartment 814 in Los Angeles, California 90014.

9 There's also my other building registration that's
10 9829, that's Dauphine Drive, Charlotte, North Carolina
11 28216. That's C/O Mary Oute (phonetic).

12 Q. What's that?

13 A. C/O Mary Oute.

14 Q. Oh, care of. Okay. I understand.

15 A. Exactly, Mary Oute.

16 Q. Okay. Where do you physically actually live?

17 A. Right now? Okay. I'm living in the US --- when
18 I'm in the US --- I'm living with my parents right now.
19 I'm specifically in Sweden right now. Sweden, Europe.

20 Q. Where in the US do you presently live with your
21 parents, where's that?

22 A. You said with my parents? They live in North
23 Carolina. That's at 9829 Dauphine Drive, Charlotte,
24 North Carolina address. ZIP Code is 28216.

25 ATTORNEY RADZIEWICZ:

1 Thank you, Michael. One second. Mr.
2 Rossi, are you still on the phone? We lost him.

3 BRIEF INTERRUPTION

4 BY ATTORNEY JOEL:

5 Q. How long has your living address been with your
6 parents in North Carolina?

7 A. It's basically my standard address and I had moved
8 back there. Let me see because I worked across the
9 whole United States also. But I moved back --- let me
10 look at a calendar real quick. It was tentatively
11 January of last year. But like I said, I worked all
12 across the United States, though, again, like one side
13 and switching over because I remember I had started
14 traveling again all over the United States.

15 Q. Just give me a little bit about your educational
16 background.

17 A. Okay. A while back I went to North Carolina A & T
18 State University, moved over to Kent State University
19 and finished my Bachelor's degree at Cal State
20 Northridge. And I went to grad school overseas at the
21 University of Groningen in the Netherlands where I got
22 one Master degree and then another Master degree at
23 Uppsala University. That's here in Sweden. So two
24 Master degrees, one Bachelor degree and of course high
25 school.

1 Q. When did you get your Bachelor's degree from Cal
2 State?

3 A. I got my Bachelor's degree in 2005.

4 Q. And what was your degree in?

5 A. It was in international business.

6 Q. When did you get your first Master's degree?

7 A. I finished my first Master's degree, I believe it
8 was in the summer of 2012 in the Netherlands. The
9 University of Groningen in the Netherlands.

10 Q. And what was that degree in?

11 A. It was a double degree program. So specifically,
12 it was international business and management. But under
13 the double degree program, the one program was called
14 international financial management. And so the one in
15 Groningen was international business and management and
16 then the one in Uppsala was business and economics.
17 But again, it's all under one core program which is
18 IFM, international financial management.

19 I graduated from Uppsala --- I'm sorry, go ahead.

20 Q. No. That was going to be my next question. When
21 did you get the degree from Uppsala?

22 A. The one from the University of Groningen was in
23 2012. The one from here in Uppsala University was in
24 2013.

25 Q. Okay. Thank you. Can you tell me about your work

1 history, please?

2 A. So I mainly work with Goldstein Ostic and
3 Associates on and off for the past two years. It's a
4 petitioning company where, mainly, I just set up tables
5 around different parts of Los Angeles. I collect
6 signatures. And if you get enough signatures to
7 qualify, and they're sufficient to qualify and get on
8 the ballot.

9 And then, this past November, that was when
10 somebody informed me of somebody else whose name was
11 Trent Pool so I flew to Chicago to meet him and then
12 from November on, I worked for Trent Pool. And that
13 was when I met him in Chicago. And then from that
14 point on, I basically traveled across the United States
15 working for Trent Pool.

16 I've been working on petitions, candidates to get
17 on the presidential ballot. And that's what I did all
18 the way until a few weeks ago. In Kentucky, that's
19 when I ended.

20 Q. Okay. Great. Let me go back a little bit, then.
21 Can you repeat the name of the company that you worked
22 for in Los Angeles?

23 A. It was Goldstein, Ostic and Associates and when I
24 say worked for, I mean I was an independent contractor.

25 Q. Yes.

1 A. So I worked there as an independent contractor.
2 So that means I can work how many hours I want and
3 where I want. So, just basically have to abide by what
4 they want. And that was where I mainly worked.

5 That's where I worked this past ten years on and
6 off. And that's in Reseda, California.

7 Q. So, just to make sure I understand, you worked for
8 this Goldstein --- or you were an independent
9 contractor for this Goldstein group for about ten years
10 ending then some time in 2015?

11 A. Yes.

12 Q. And the nature of that work was to collect
13 signatures on various petitions?

14 A. Right. And the difference is, mainly when I
15 worked for them it was mainly initiative seeking on the
16 ballot. Not much presidential campaigns, but mainly
17 initiatives. So you know, one, for example, was to
18 keep the Malibu Santa Monica School District. It was
19 to keep the two school districts the same for Malibu
20 and Santa Monica, California. That's like one example
21 of it.

22 Q. And did you solely perform the signature gathering
23 functions in California for that group?

24 A. I solely performed all the signature gathering in
25 California for that group.

1 Q. So you didn't go to any other states for that
2 group to collect signatures?

3 A. Exactly.

4 Q. And then how is it that you heard of Trent Pool?

5 A. Well, I kind of know somebody in Los Angeles. His
6 name is Mark. He basically just gave me a referral to
7 like call this guy up whose name was Trent Pool. And
8 so I took his advice. I called him up and I was not
9 going to go up, first, to Chicago. But I was speaking
10 with Trent and I figured that working about Los
11 Angeles, no matter how hard I work or how much money I
12 make, it's very stressful.

13 So I said well what do I have to do lose, I'll
14 just give it a shot anyway. And then I moved to
15 Chicago shortly after I had spoke with him on the
16 phone. Like in a matter of days. And then, that's
17 when I met him. We sat down and ate and drank.
18 Shortly after that, like the very next day, he put me
19 to work in the Chicago area.

20 Q. Let's start then, back --- and that was about
21 November of 2015?

22 A. Yes. Mostly around November the 14th or 15th,
23 around that time.

24 Q. So where was the first place that you went to work
25 for Trent Pool?

1 A. The first place that I went to work, it was like a
2 town North of Chicago. I believe it's called Dearborn,
3 if I'm not mistaken. It was like in the Dearborn
4 Waukegan area. That was like around the time when I
5 first, first started. And then, I tried to work in
6 Gurnee. That's like further North of Chicago, but not
7 up towards, of course, of the Wisconsin border. But
8 North of Chicago.

9 Keep in mind, I was going to different locations
10 throughout the day.

11 Q. What were you doing --- what was the first ---
12 strike that. Let's ask it this way.

13 The first --- strike it. Let's ask it this way.

14 All of the work you did for Trent Pool, do you
15 understand that it was for his company, Benezet?

16 A. Yes.

17 Q. All right. So all the work that you did for
18 Benezet, was it all collecting signatures?

19 A. Yes.

20 Q. Now, this first place you went in Dearborn, what
21 were you collecting for? Was it a candidate? Was it a
22 party? Was it an initiative? What was it?

23 A. They were all for candidates representing their
24 own party. I know one was, I believe --- I'm going to
25 have to look it up on my cell phone because it's been

1 so long and I worked on so many issues. I kind of
2 like, you know, forgot. But I believe one was called
3 Kirk --- okay, I'm going to have to look for it in my
4 cell phone. Because they were all like statewide
5 initiatives for candidates to get on the ballot. But I
6 forgot the actual order of them. So can you hold on
7 real quick?

8 Q. Sure.

9 A. Okay.

10 BRIEF INTERRUPTION

11 BY ATTORNEY JOEL:

12 Q. Why don't we ask it this way? The first state you
13 worked in was Illinois?

14 A. Yes.

15 Q. And you started there the middle of November,
16 2015?

17 A. Yes.

18 Q. How long were you in Illinois collecting
19 signatures?

20 A. I was only there for like a few weeks and then, I
21 believe, from there I went to Indiana.

22 Q. So before we get to Indiana, I just want to make
23 sure that we're clear. So for a few weeks beginning in
24 mid-November, 2015, you collected signatures in
25 Illinois; correct?

1 A. Yes.

2 Q. And when you were in Illinois collecting these
3 signatures, am I correct that you went to different
4 locations around the state to collect them?

5 A. Yes, because it was a little bit hard, sometimes.
6 Like, I would go to one spot, like maybe at a Whole
7 Foods. Like in the Deerfield area and like they would
8 tell me it's okay. You can do petitions here. And
9 then like, the very next day, like another manager, he
10 was just lower-end, they would just give me a very hard
11 time and tell me that I cannot be there at this
12 location.

13 And so it kind of went around like that in this
14 area. And so I went to another CVS which was --- like
15 I know the areas, but I don't know them by name. But
16 it's not too far from the lake. And again, the same
17 issue where it's like I went to a CVS. The manager
18 said it was okay but somehow the cops came anyway. One
19 cop was okay with it 'cause he saw that I really wasn't
20 breaking any laws and I was being legitimate
21 basically about it.

22 But then another cop was like --- he didn't kick
23 me out but he just --- you know, he kind of gave me a
24 hard time saying if any of you crosses this line right
25 here, then you're going to jail and things like that.

1 But that was when I was in the Chicago area.

2 Q. And when you were Illinois collecting these
3 signatures, did you stay at different hotels depending
4 on where you were collecting?

5 A. Yes. I tried to. First, I stayed at the Red Roof
6 and then from there we kind of scattered about.

7 Q. Now, when you were in Illinois collecting, that
8 was for a candidate?

9 A. If I'm not mistaken, it was for multiple
10 candidates. I was here trying to figure out, in my
11 e-mail, which ones they were because I believe they
12 were for like Rand Paul. And then another one was ---
13 man, I can't think of the other guy's name.

14 Q. Ted Cruz?

15 A. One was for Rand Paul.

16 Q. Was the other one ---?

17 A. I believe it was for Ted Cruz, also.

18 Q. Okay.

19 A. I think there was another senator for one of the
20 state --- either Mark or Kirk, something.

21 Q. Oh, okay. So the Illinois senator.

22 A. Yes.

23 Q. The Illinois senator, Mark Kirk. Okay.

24 A. Exactly. Yeah.

25 Q. So from Illinois, did you then go straight to

1 Indiana?

2 A. I believe I went to Lafayette, Indiana. I
3 believe, if I recall.

4 Q. And was that to collect signatures in Indiana on
5 behalf of Benezet?

6 A. Yes.

7 Q. How long were you in Indiana for?

8 A. I want to say I was there for like a month, but
9 that might be pushing it.

10 Q. Okay.

11 A. But at least a few weeks for sure.

12 Q. When you were in Indiana, did you move about the
13 state and collect in different locations?

14 A. Yes, I did. At first, I was in Lafayette and that
15 was my first time period. And then after that, I went
16 all over the state. I went to Indianapolis. I worked
17 in the Indianapolis area. I also worked a district
18 north of Indianapolis, and I went to Fort Wayne. I
19 went to Bloomington.

20 Let me see. Lafayette, Indianapolis, Bloomington,
21 Fort Wayne and Elkhart, of course.

22 Q. Okay.

23 A. And then, I believe, whatever city that has the
24 school. Notre Dame's area, that area also.

25 Q. It's South Bend.

1 A. South Bend, of course. Yeah.

2 Q. When you were traveling around Indiana collecting
3 all of these signatures, did you stay in different
4 hotels depending on the location you were at?

5 A. Yes, I had to. Otherwise it would have been
6 extremely complicated if I did not.

7 Q. Fair enough. And who were you collecting
8 signatures for when you were in Indiana?

9 A. Let me see. I just have to go back to my phone.
10 I was working late earlier today and I just need to get
11 them out in front of me so let me check right now.

12 Q. Sure.

13 A. Because these should all be inside of my e-mail,
14 right now.

15 I'm looking at my e-mails. I believe it was for
16 Rick Santorum and Rockie De La Fuente. And there was
17 most likely more, also.

18 Q. It was most likely what?

19 A. It was most likely other candidates also. I'm
20 just trying to find my invoices to ---.

21 Q. Was the collection for Rocky De La Fuente, was
22 that for him as a democrat to get on the democratic
23 primary ballot?

24 A. I believe so.

25 Q. And for Rick Santorum, that would have been for

1 him to get on the republican primary ballot?

2 A. Yes. If you could just bear with me as I, like,
3 just check. My phone's a little bit slow right now.
4 But I'm just trying to like get into my e-mail.

5 Q. That's fine. Any luck, Mr. Jennings?

6 A. I'm sorry. What was that?

7 Q. Any luck with finding the other candidates?

8 A. My phone is going very, very slow. Right now, I'm
9 just going to have to say, yeah. Rick Santorum and
10 Rocky De La Fuente.

11 Q. Okay.

12 A. I shall say that for right now.

13 Q. That's fine. As we move ---.

14 A. I believe that's on my phone.

15 Q. As we move forward, if any of them come back to
16 you, just let me know and we'll circle back; okay?

17 A. Okay. Thanks.

18 Q. All right. Where did you go from Indiana?

19 A. From Indiana, if I'm not mistaken, I went to
20 Wisconsin. What town was it called? It was Wausau.

21 Q. And did you go straight from Indiana to Wisconsin
22 to collect signatures?

23 A. Yes. I drove there.

24 Q. And how long were you in Wisconsin for?

25 A. I believe I was there for three weeks. It might

1 have been two weeks, though.

2 Q. And who did you collect signatures for in
3 Wisconsin?

4 A. I believe it was for Rocky De La Fuente, also.

5 Q. Anybody else or just Rocky De La Fuente?

6 A. I could check right now. I'm trying to check
7 right now.

8 Q. Was the collection for Rocky De La Fuente as Rocky
9 as a democrat to get on the democratic primary in
10 Wisconsin?

11 A. I believe it was for him in as democrat, but I'm
12 not 100 percent sure because it could have been for the
13 American Delta party in Wisconsin, also.

14 Q. When you were in Wisconsin collecting signatures,
15 did you collect at various locations throughout the
16 state?

17 A. Yes. It was very hard in Wisconsin, for me.

18 Q. Why is that?

19 A. I went to colleges because it was just --- a lot
20 of people were very, very quick to tell me to leave.
21 And I would try to explain to them, you know, what my
22 job was. But a lot of people really did not care. And
23 they were quick to call the police on me. If I'd just
24 try to even explain to them a little bit of what it was
25 about and they would all say, no, you have to go right

1 now. We'll call the police on you right now if you
2 don't leave right now.

3 And so even when I went to the university and got
4 permission to be at the university. But even then,
5 again, one of the faculty members called the police on
6 me. And, in my opinion, fabricated the story to say
7 that I was harassing. Which, in my opinion, I was not
8 at all. I was just waving at people. And then waving
9 at them, that didn't work. So they came over to me. I
10 explained to them what I was doing was just collecting
11 signatures. But that was all in Wisconsin. It was a
12 tough environment.

13 Q. When you were collecting signatures in Wisconsin,
14 were you working alone?

15 A. I worked independently, yes, but there was other
16 workers also throughout the city.

17 Q. But when you were out collecting signatures, you
18 were collecting them independently on your own. You
19 were walking your own location. You were contacting
20 your own people, whoever you came with. You didn't
21 have somebody there with you; is that correct?

22 A. Right.

23 Q. And when you worked these different locations in
24 the State of Wisconsin, did you stay at various hotels
25 throughout the state?

1 A. Yes. No, no, sorry. I believe I said I worked
2 --- it was only one city. And so I stayed at the La
3 Quinta Inn, if I'm not mistaken and a Quality Inn.

4 Q. Do you know how many signatures you collected in
5 Wisconsin?

6 A. I do not, off the top of my head, unfortunately.

7 Q. Do you know how many signatures you collected ---?

8 A. I guess I could find out if --- if I would be on
9 my computer, then I could find out exactly.

10 Q. That's fine.

11 A. So it's frustrating like, my computer is acting up
12 today. I honestly have no idea how many I got in
13 Wisconsin.

14 Q. Do you have any estimate how many signatures you
15 got in Indiana for either Rocky or Santorum?

16 A. I can't say anything because I was there for a
17 long time.

18 Q. How about in Illinois? Can you give me any
19 estimate as to the number of signatures you got for any
20 of the folks you collected for?

21 A. No. Not at this time.

22 Q. All right. Any further recollection who you
23 collected for in Wisconsin?

24 A. No.

25 Q. From Wisconsin, where did you go to collect

1 signatures for Benezet?

2 A. I believe I went to Pittsburgh, Pennsylvania after
3 Wisconsin.

4 Q. Do you know how long you were in Pennsylvania for?

5 A. I was there in Pennsylvania for weeks, about a few
6 weeks.

7 Q. Did you go straight from Wisconsin to
8 Pennsylvania?

9 A. I believe so.

10 Q. Did you drive there?

11 A. Yes. I drove there.

12 Q. Who did you collect signatures for in
13 Pennsylvania?

14 A. I'm pretty sure I collected signatures for Rocky
15 De La Fuente in Pennsylvania. Other than Rocky, I
16 believe I worked for Ted Cruz, also. And I believe
17 that was it. Again, without my computer it's kind of
18 hard for me to know or remember because I was in too
19 many states.

20 Q. We'll get there. I appreciate it. The Rocky De
21 La Fuente signature collecting in Pennsylvania, was
22 that for Rocky as a democrat to get on the democratic
23 ballot this first time?

24 A. I thought it was for the American Delta Party, but
25 again, I'm not 100 percent sure.

1 Q. The Cruz collection, was that for Cruz as a
2 republican to get on the republican primary ballot?

3 A. Yes.

4 Q. Can you give me any ---?

5 A. I think I have this right. I hope I have the
6 order rights for the states, though, 'cause ---.

7 Q. That's okay. Can you give me any estimate as to
8 how many signatures you collected for either Rocky or
9 Cruz?

10 A. Off the top of my head, I cannot. I can't really
11 say.

12 Q. Okay.

13 A. I actually don't know, off the top of my head.
14 because there was times where I got some and then I got
15 more afterwards and --- yeah. I would have to look. I
16 have the numbers but they're inside my computer.

17 Q. When you were in Pennsylvania, do you remember if
18 it was the wintertime?

19 A. It was definitely the wintertime; it was very
20 cold.

21 Q. That's very helpful, actually, that you remember
22 it was the wintertime and cold. That's actually very
23 helpful. When you were in Pennsylvania collecting
24 signatures for Rocky De La Fuente and Ted Cruz, did you
25 go to various locations throughout the state?

1 A. I went to various locations throughout the
2 metropolitan of Pittsburgh.

3 Q. So you were collecting for both of those in the
4 Pittsburgh area?

5 A. Yes.

6 Q. Did you stay at different hotels in the Pittsburgh
7 area or just one hotel?

8 A. I stayed, mainly, at a house provided by Trent as
9 I recall. I don't recall --- I went there twice, of
10 course. But the second time I stayed at a hotel and if
11 I'm not mistaken, I stayed at this house for like, the
12 majority of the time, if not all of the time.

13 Q. Where did you go from Pennsylvania to collect
14 signatures?

15 A. I believe I quit working with Benezet for a while
16 or for a little bit.

17 Q. Why did you ---?

18 A. I mean, Trent, he called me for other people. And
19 if I'm not mistaken, this is the order that it went in.
20 I left Pennsylvania. If I'm not mistaken, I went to
21 Boston to work in the Massachusetts area. And then
22 from there I went to the Seattle area and I even went
23 back to Los Angeles, briefly, to work on the Goldstein
24 Ostic Associates because there was a lot of work in Los
25 Angeles.

1 See, I kind of felt like with Trent, he's a good
2 guy, though --- but I felt like I was missing out
3 because if I had stayed with my Goldstein Ostic and
4 Associates the whole time, a nice winter was on the
5 table in California into the spring and into the summer
6 and so ---. And I was cool with Trent, so he let me do
7 it for the summer and said that I couldn't called.
8 Then I resumed working with Trent once, I believe ---
9 oh, yeah. So once I left Boston that was when I was
10 back working with Trent when I came down to Atlanta.
11 Q. Let me stop you there for a second. I want to
12 make sure I got this. So after Pennsylvania, in the
13 winter time, you stopped working for Benezet; correct?
14 A. Yes. For like, some time. Little bit of time.
15 Yes.
16 Q. And then you went to Massachusetts and signature
17 collected in Massachusetts?
18 A. Yes.
19 Q. And was that for a candidate or what was that for?
20 A. It was for --- wait a minute. I think that was
21 for initiatives only or one was to legalize marijuana.
22 Something of that sorts and then there were three other
23 ones but I just cannot remember the ones off the top of
24 my head --- another one was charter schools. Yeah, I
25 forgot the others, too.

1 Q. How long were you in Massachusetts for?

2 A. I was there for a few weeks or maybe three weeks.

3 Q. And when you were in Massachusetts ---?

4 A. This is when it's already getting warm, though.

5 So wait a minute. I must have gotten that wrong.

6 Maybe I went to Los Angeles and then I went ---. So

7 maybe once I stopped working with Trent, I went to Los

8 Angeles and then went to Boston. I think that's how it

9 went. Yes.

10 So then, by the time I went to Boston it was
11 already spring I guess because it was like already
12 warm.

13 Q. So let's back up a second. So you left
14 Pennsylvania. After that winter collection for Rocky
15 and Cruz your testimony is that you then went back to
16 Los Angeles and collected signatures for Goldstein
17 Associates?

18 A. Yes.

19 Q. How long were you in Los Angeles doing that?

20 A. I believe I was there for like six weeks or so.

21 Q. Did you collect signatures for candidates or was
22 it for initiatives? What was the nature of your work
23 in Los Angeles?

24 A. I believe it was all for initiatives and it was
25 not just for Los Angeles. I believe I was in San Diego

1 also working on the petition to keep the San Diego
2 Chargers in San Diego. Keep the stadium, you know ---
3 enhanced the way it was. So I was in Los Angeles and I
4 was in San Diego back and forth also.

5 And from there, when I was in San Diego, I worked
6 with Ron. I forgot his last name. It was something
7 like Isaac (phonetic) or something like that. I worked
8 for another company, though, briefly in San Diego also.
9 It was like back and forth between them and Goldstein
10 Ostic Associates when I was in California or during
11 this brief time period.

12 Q. And then if I understand your testimony, after
13 California, when you were there for six weeks, you then
14 went to Massachusetts and you were in Massachusetts for
15 a few weeks?

16 A. Yes.

17 Q. And while in Massachusetts you were collecting
18 signatures for initiatives, ballot initiatives?

19 A. Yes, yes.

20 Q. And did you go straight from Pennsylvania to Los
21 Angeles to do that one?

22 A. I probably collected for Rocky also in
23 Massachusetts also but I'm not 100 percent sure. I
24 believe we added him to the board around the time that
25 I was leaving, if I'm not mistaken.

1 Q. So when you left Pennsylvania, did you go right to
2 Los Angeles to do that work?

3 A. Yeah. I believe so, yes.

4 Q. And then when you left the California work, did
5 you go straight to Massachusetts for that work?

6 A. Yes.

7 Q. And then after Massachusetts, did you then go to
8 Seattle, Washington to collect signatures?

9 A. In the Seattle metropolitan, yes.

10 Q. And was that for Benezet or was that for somebody
11 else?

12 A. That's for somebody else. Your way petitions with
13 Brett Johnson (phonetic).

14 Q. Was the Massachusetts work for Benezet or for
15 somebody else?

16 A. It was for Alex Arsenault (phonetic).

17 Q. And how long were you in the Seattle metropolitan
18 area?

19 A. I'm sorry. What was that?

20 Q. How long were you in the Seattle, Washington
21 metropolitan area?

22 A. I believe for like another I want to say four
23 weeks or so.

24 Q. What were you collecting signatures for?

25 A. Let me think. Yeah, it's just not coming to me.

1 As soon as I find out on my cell phone. It was like I
2 think four issues and --- yeah, it's just not coming to
3 me right now.

4 Q. Did you move around the Seattle area and collect
5 signatures in different locations?

6 A. Yeah. I collected in Kid. I collected in Tacoma.
7 I collected in the Bellvue area and another town that's
8 nice on the eastern side of the countryside. And then
9 I collected in kind of like a city that's like in
10 between Seattle and Vancouver Canada, like towards the
11 border. It's Mount something. Yeah. I was definitely
12 all over the place in the Washington area also.

13 Q. Did you stay in different locations at different
14 hotels when you were all over the place in Washington?

15 A. I stayed at different hotels, yes. From what I
16 know, the expenses were not paid so that was out of
17 pocket, also.

18 Q. Where did you go after Seattle, Washington to
19 collect signatures?

20 A. After Seattle, I briefly went back to Benezet
21 consulting which was when I flew down to Atlanta. And
22 then when I went back to Seattle, then I went back to
23 Pennsylvania and this time it was the summertime. So
24 it was much hotter out there this time --- yeah. I
25 worked out there in Pennsylvania again.

1 Q. When you were in Atlanta, you were collecting
2 signatures on behalf of Benezet?

3 A. Yes.

4 Q. And who were you collecting for? Candidates
5 or ---?

6 A. I believe it was for Jill Stein. I believe they
7 was for Jill Stein and Rocky De La Fuente.

8 Q. Do you know how many signatures you collected for
9 either Jill Stein or Rocky De La Fuente?

10 A. I believe it was 205 but they did not count
11 because of something that happened where, I guess,
12 Trent had messed up with something. If I'm not
13 mistaken, it was a collection for like 205 for Rocky
14 and 175 for Jill Stein.

15 Q. How long were you in Atlanta collecting for Jill
16 Stein and Rocky?

17 A. It was only for like two and a half days.

18 Q. Did you only collect in Atlanta or did you go to
19 other parts of the state?

20 A. It was only the Atlanta metropolitan area. So
21 like Atlanta and also maybe a little bit of DeKalb
22 County, maybe.

23 Q. Did you stay in just one hotel there or did you
24 move around?

25 A. I would say I moved around. First at some hotel

1 in downtown. I forgot the name. The second one was
2 either at the Sheraton or the Marriott or something
3 like that.

4 Q. And did you go --- your previous one in Seattle,
5 Washington area --- did you go straight from there to
6 the Atlanta job?

7 A. Yes. I did. After that I went back to Seattle
8 because I still had my other rental car in Seattle the
9 whole time. I went back to Washington like right after
10 that.

11 And then shortly after that ---.

12 Q. So just to make sure I --- so right after Atlanta,
13 you went back to Seattle to collect signatures?

14 A. If I'm not mistaken, that's how it went. But then
15 a little bit later ---.

16 Q. Hold on. When you went back to Seattle, was that
17 collecting signatures on behalf of Benezet or somebody
18 else?

19 A. Well that was for your way petitions with Brett
20 Johnson.

21 Q. And how long were you in Seattle that second time?

22 A. I believe I was just there for like a few more
23 days.

24 Q. And did you move around to different parts of the
25 Seattle area?

1 A. The whole time I was there, I moved around to
2 different parts of the Seattle area.

3 Q. Did you stay in different hotels while you were
4 there?

5 A. Yes.

6 Q. Then after Seattle, did you then go to
7 Pennsylvania to work?

8 A. Yes.

9 Q. And was that for Benezet?

10 A. Yes.

11 Q. How long were you in Pennsylvania the second time?

12 A. Only for a little bit. I guess like a week or so
13 or maybe two weeks.

14 Q. And do you remember what candidate or issue you
15 were collecting for?

16 A. I believe it was only for Rocky.

17 Q. Do you know if that was Rocky De La Fuente as an
18 independent third party candidate?

19 A. I believe it was for the American Delta Party, but
20 I'm not 100 percent sure.

21 Q. Do you know how many signatures you got for Rocky?

22 A. Man, I was just there. Let me see. Let me just
23 think back. It's not coming to me right now, so I'd
24 better not say.

25 Q. That's fine. When you were collecting signatures

1 this second time in Pennsylvania for Benezet, did you
2 move around to different areas and different parts of
3 the state?

4 A. No. Only Pittsburgh.

5 Q. Did you stay in different hotels in the Pittsburgh
6 area?

7 A. Yes.

8 Q. Where did you go after Pennsylvania to work?

9 A. After Pennsylvania, I went down to Birmingham,
10 Alabama. No. Sorry. Hold on. I missed a whole
11 chunk. I went to Columbus, Ohio, also.

12 Q. After Pennsylvania?

13 A. I believe so. Yes.

14 Q. How long were you in Ohio?

15 A. Maybe like ten days or so.

16 Q. Did you go straight from Pennsylvania to work to
17 Ohio to work?

18 A. I might have gotten everything mixed up, but I
19 believe so. Yes. I drove to Ohio from Pittsburgh.

20 Q. Were you working in Ohio on behalf of Benezet?

21 A. Yes.

22 Q. Who were you collecting for in Ohio? What
23 candidates or issues?

24 A. I want to say it was for Rocky De La Fuente in
25 Ohio ---.

1 Q. And was that for the American ---?

2 A. I believe so. And I believe I also worked for
3 Darrell Castle in Ohio also, but I can't say for sure.

4 Q. Was the Rocky work for Rocky as an independent or
5 the American Delta Party?

6 A. Well I thought I was. When he was working for
7 the American Delta Party, it's the same as him being an
8 independent candidate. Yes.

9 Q. Do you know how many signatures you got for either
10 Rocky or Mr. Castle?

11 A. I do not know off the top of my head.

12 Q. Did you move around to different parts of Ohio to
13 collect these signatures?

14 A. I was not able to. I only worked in the Columbus
15 area.

16 Q. Did you stay in different hotels in the Columbus
17 area or one hotel?

18 A. Yes. Different hotels.

19 Q. Where did you go from Ohio to collect signatures?

20 A. If I'm not mistaken, from Ohio I went back to
21 Pittsburgh, if I'm not mistaken, to briefly work for
22 Rocky. Oh no, sorry. I think I know what happened
23 last. So I went to Pittsburgh, went to Columbus and
24 then I believe I went back to Pittsburgh and also ---
25 no. Okay. I've got it.

1 When I went to Pittsburgh, I believe I went to
2 Haysburg (sic), if I'm not mistaken, Pennsylvania. And
3 then I worked a little bit out there in Haysburg and
4 then I went to Ohio. And then I had returned to
5 Pittsburgh but then I flew down to Atlanta. I'm sorry.
6 Not Atlanta. Birmingham, Alabama.

7 Q. So let me make sure I've got this straight.

8 A. Hope I'm not going too fast.

9 Q. No. That's okay. Let me just make sure I've got
10 this straight. So when you resumed with Benezet, you
11 went to Atlanta, Georgia for about two and a half days
12 to collect signatures; correct?

13 A. Yes.

14 Q. You then went back to Seattle, Washington and
15 worked for a different company to collect signatures;
16 correct?

17 A. Correct.

18 Q. After a few days in Seattle, you then went to
19 Pennsylvania and collected signatures as an independent
20 contractor for Benezet for a week or two; correct?

21 A. Correct.

22 Q. And that was for Rocky De La Fuente as an American
23 Delta Party candidate; correct?

24 A. Correct.

25 Q. And then after Pennsylvania, you went straight to

1 Ohio as an independent contractor for Benezet and
2 worked there for about ten days in the Columbus area
3 collecting signatures; correct?

4 A. I believe so. Correct.

5 Q. And then from Ohio, you went back to Pittsburgh,
6 or Pennsylvania and collected more signatures for Rocky
7 De La Fuente?

8 A. I believe so. But I know at some point I went to
9 Haysburg. So let me think. Damn, I can't give you the
10 strategy as to the order that I worked in.

11 Q. Well, did you ever go to Mississippi to work?

12 A. I did not go to Mississippi. I went to Wyoming.
13 Some people went to Mississippi. I went to Casper,
14 Wyoming. But before that, I flew to Birmingham,
15 Alabama.

16 Q. All right. So from Ohio, you went back to
17 Pennsylvania. How long were you in Pennsylvania that
18 time?

19 A. The last time, I think that's the way it was that
20 it was only for very few days.

21 Q. And were you collecting for Rocky again that time
22 or were you collecting for the OpenPittsburgh.org
23 initiative?

24 A. It was for Rocky. I never worked for --- I don't
25 recall working for the OpenPittsburgh.org initiative.

1 Q. Okay. When you were in Pennsylvania that next
2 time, did you go to different locations of the state?

3 A. No.

4 Q. Did you stay in one hotel or did you switch around
5 hotels?

6 A. I believe I stayed at a friend's place. It was
7 like a few days, if I'm not mistaken.

8 Q. Then from that Pennsylvania trip, did I understand
9 the next place you went was Alabama?

10 A. Yes.

11 Q. How long were you in Alabama for?

12 A. If I'm not mistaken, it was only for like a week
13 or so.

14 Q. Did you go straight from Pennsylvania to Alabama?

15 A. Yes.

16 Q. Were you collecting in Alabama as an independent
17 contractor for Benezet?

18 A. Yes.

19 Q. Were you collecting for candidates or issues in
20 Alabama? Mr. Jennings, in Alabama, were you collecting
21 for a candidate or an issue?

22 BRIEF INTERRUPTION

23 BY ATTORNEY JOEL:

24 Q. Mr. Jennings, I think the question that I had
25 asked that you got cut off on was when you went from

1 Pennsylvania this next time, to Alabama, did you go
2 straight there?

3 A. Yes. I flew straight from Pennsylvania to
4 Alabama.

5 Q. And who did you collect for in Alabama?

6 A. In Alabama, I believe it was for Rocky and I
7 thought it was for one other person, also. I'm
8 checking the thing right now. Hopefully my phone is
9 working better right now. I'll see if it will come up.
10 I see it but I can't pull it up. But I believe it was
11 --- yeah, let me see. I want to say it was for Rocky
12 and Darrell Castle but I can't help you confirm that at
13 this time, though.

14 Q. Okay.

15 A. I tried finding it while I had you on
16 speakerphone. I have you on speakerphone and I tried
17 to access my e-mail.

18 Q. So, in any event, I think you told me that you
19 were in Alabama working for Benezet for about a week;
20 is that right?

21 A. I believe so. Yes.

22 Q. Do you have any estimate as to how many signatures
23 you collected for either Rocky or Castle?

24 A. See, I don't. Without looking at an invoice, I
25 can't really say anything 'cause I could get it mixed

1 up with everything else.

2 Q. Do you know how many you collected for any of the
3 candidates when you were in Ohio?

4 A. At this time, no.

5 Q. During your first summertime stint in Pennsylvania
6 when you were collecting for Rocky, do you know how
7 many signatures you got that time?

8 A. No.

9 Q. So when you were in Alabama, did you collect
10 signatures around different parts of the state?

11 A. Yes. No, only around Birmingham, Alabama.

12 Q. Only around Birmingham?

13 A. Yes.

14 Q. Did you stay in different ---?

15 A. No. Sorry. I went to different parts of the state.
16 It was for DC and Mobile also.

17 Q. Okay.

18 A. I got a few signatures in Mobile, also.

19 Q. Did you stay in different locations at different
20 hotels around the State of Alabama?

21 A. I cannot recall if I stayed --- I would say that
22 most time I stayed in Birmingham, but I cannot recall
23 if I spent the night in Montgomery or Mobile after I
24 drove there.

25 Q. Where did you go after Alabama?

1 A. I went to Casper, Wyoming.

2 Q. And was that as an independent contractor for
3 Benezet?

4 A. Yes. I guess, technically --- I thought it was at
5 first. So I guess, technically, I worked for Your Way
6 petitions which was through Brett Johnson.

7 Q. Which is who?

8 A. It was through --- I don't know what his last name
9 is. But I know Brett Johnson is above Doug.

10 ATTORNEY RADZIEWICZ:

11 It was through Brett Johnson but he was
12 just being an intermediate person. His first name was
13 Doug. So, it was through Doug, but ultimately through
14 Brett Johnson.

15 BY ATTORNEY JOEL:

16 Q. So the middle person was Doug and the ultimate
17 person was Brett Johnson?

18 A. Yes.

19 Q. How long were you ---?

20 A. It was still coordinated by Brett. Then, I went
21 to Wyoming for, I guess, about three weeks or so.

22 Q. Three weeks?

23 A. Or two and a half weeks or something like that.

24 Q. Did you go straight from Alabama to Wyoming?

25 A. Yes.

1 Q. Who did you collect signatures for in Wyoming?

2 A. I'd have to look at my phone. I want to say Rocky
3 and Jill Stein but I wish I could pull this up now.

4 Q. Do you know how many signatures you collected for
5 either Rocky or Jill Stein?

6 A. Actually, I do. I'm going to try to find this out
7 real quick. I can't.

8 Q. Okay.

9 A. It was multiple turn-ins so I wouldn't know.

10 Q. Did you collect signatures in various parts of the
11 state of Wyoming?

12 A. No. I was only in the Casper area.

13 Q. Did you stay in different hotels or just in a
14 hotel in Casper?

15 A. I just stayed in a hotel in Casper that I kept on
16 extending periodically throughout the whole time there.

17 Q. Where did you go after Wyoming?

18 A. After Wyoming, I went to North Dakota.

19 Q. How long were you in North Dakota for?

20 A. I believe for like a week or so.

21 Q. Did you go straight from Wyoming to North Dakota?

22 A. Yes. I drove there.

23 Q. Were you in North Dakota as an independent
24 contractor for Benezet?

25 A. Yes.

1 Q. Who did you collect signatures on behalf of ---?

2 A. I was. But Andy Jacob was the middle man.

3 Q. Okay. Who did you collect signatures for when you
4 were in North Dakota?

5 A. I'm sorry. You said who did I collect for in
6 North Dakota?

7 Q. Yeah.

8 A. I believe it was for Rocky and --- I cannot recall
9 if there was anybody else also.

10 Q. Do you know how many signatures you got for Rocky?

11 A. In North Dakota --- I should know this 'cause I
12 just turned this in. Man, now I'm getting this mixed
13 up with Wyoming. Let me see for a quick second. I
14 want to say roughly like 475. But again, I'm not 100
15 percent sure, though.

16 Q. Okay.

17 A. I think it was for Rocky De La Fuente and Darrell
18 Castle. Oh, no. Rocky De La Fuente --- I guess it's
19 for Rocky and maybe Darrell Castle. And I believe it
20 was for something like 455 or 465 or something like
21 that.

22 Q. For Rocky De La Fuente?

23 A. Yeah.

24 Q. When you were in North Dakota, did you collect
25 signatures around various parts of the state?

1 A. Yes.

2 Q. And did you stay in hotels around various parts of
3 the state?

4 A. Yes.

5 Q. Where did you go from North Dakota?

6 A. And then, my last route was in Kentucky.

7 Q. How long were you in Kentucky for?

8 A. I was only there for like a day and a half.

9 Q. And was that as an independent contractor for
10 Benezet?

11 A. Yes.

12 Q. Who were you collecting for in Kentucky?

13 A. For Rocky.

14 Q. Do you remember how many signatures you got?

15 A. I believe it was like 166 or 160 or something like
16 that.

17 Q. And did you go to different parts of the
18 Commonwealth of Kentucky?

19 A. No. I believe I just went to --- okay, it was only
20 in the Louisville area. And I only worked like the
21 college campus and one other spot also.

22 Q. Did you stay in different hotels or just one
23 hotel?

24 A. I stayed at different hotels for the two weeks
25 that I was there.

1 Q. And did I understand you correctly that Kentucky
2 was your last signature collecting job for the 2016
3 season?

4 A. Yes.

5 Q. Do you get paid by Benezet per signature?

6 A. Yes.

7 Q. Do you know if you have any written contract with
8 Benezet to provide independent contracting services?

9 A. I signed one earlier when I first met Trent, so,
10 yes.

11 Q. Did Benezet or Trent provide you with any sort of
12 script or what you were supposed to say to try to get
13 people to sign petitions?

14 A. I believe he might have showed me something. But
15 the best way for me is to go at it by myself, and so
16 that's how it was when I first met Trent. And that's
17 the way he understands it also.

18 Q. Okay.

19 A. He's worked with me with the scripts in the past.
20 Yes.

21 Q. How did you --- what was your --- strike that.

22 What was your methodology for trying to get people
23 to sign?

24 A. My whole methodology to read whatever their facial
25 expressions are right when I first glance at them. You

1 know, like, if they're down then try to come at them at
2 like a more calmer level. If they seem very energetic,
3 then seem energetic also. When I first try to explain
4 to them what exactly I am doing in their area.

5 Q. And am I correct that since you get paid by
6 signature, the more signatures you get, the more money
7 you make?

8 A. Yes.

9 Q. And am I correct --- we've heard some testimony
10 from others in this case about people using more than
11 one board for signatures. How many boards do you
12 usually use?

13 A. I only have six, but I know we never get six at
14 the same time. But I always try to have at least six,
15 so that way if I get lucky, I can get six people to
16 sign at the same time while I quickly look at
17 everybody's signatures to make sure that they're
18 actually writing down everything correct.

19 Q. The various times when you were in Pennsylvania,
20 am I correct that you actually were successful in
21 getting people to sign petitions?

22 A. Yes. I got signatures. Pennsylvania, so, yeah.
23 I would consider myself somewhat successful. It was
24 very hard also, though. It was probably one of the
25 most tougher areas.

1 Q. Why do you say that?

2 A. Because for me, at least, I did not find any
3 spots. So I just had to deal with whatever I can.
4 Whether that's at a gas station --- when I have a
5 harder time finding a spot, then I have to go to slower
6 spots where there's less traffic. Where's there's less
7 of a chance of me getting complaints or getting kicked
8 out.

9 Q. Can you give me any sense --- how long do you
10 interact with a person, on average --- or what's the
11 range of time that you interact with a person from when
12 you first approach him or her until you get a signature
13 or they walk away from you?

14 A. My entire purpose, up front, is that I try to get
15 them to sign up front. I don't want to deter people
16 once they're already signing. So it's very quick, like
17 in a matter of seconds flat because we still try to get
18 the candidate on ballot, can you help us out, please?
19 They're a very good guy.

20 And I might say like a few things about him. Give
21 me any mirror, reading a hint that they're not going to
22 sign, then I go on to the next person or I don't even
23 talk any further. This is kind of contrary to what
24 Trent taught me because it's like don't take no for an
25 answer unless it's a real no. But I'm kind of

1 different. It's a lot of people, so, talk to other
2 people.

3 Q. So your methodology is to try to get through
4 people as quickly as possible ---?

5 A. Exactly.

6 Q. And if they give you a no, you move on to the next
7 one to try to get the next person. So you're all about
8 trying to get the signatures as fast as you can?

9 A. Right. But also, a lot of times, you know, when I
10 get somebody to sign it's like I'll just build a
11 conversation with them as they're signing. I just feel
12 like by doing that even though if I'm missing
13 signatures which a lot of times, I do miss signatures
14 by continuing a conversation during and after the
15 signature --- for me, it's worth it because it gives me
16 like a positive vibe. It just helps me out you know
17 with positive energy, so ---.

18 Q. Okay.

19 A. I don't always like just, you know, end it. Like
20 I'll quickly get a signature, but after that I kind of
21 drag it out afterwards. I don't strictly just focus on
22 the opportunity just my whole time working. 'Cause I
23 feel like if I build a rapport, other people around me
24 can sense that and then I build it in from there.

25 Q. And when you approach somebody, what do you tell

1 them? Do you tell them I'm trying to get this person
2 on the ballot or what kind of interaction do you have
3 with them?

4 A. Well it depends on the neighborhood and it depends
5 on, typically, the type of people that I'm dealing
6 with. A lot of times I just tell the people, you know,
7 like I'll compliment them or I'll see like a sports
8 team and be like hey I saw the game last night. Just
9 real quick, can you help us out? Are you registered to
10 vote? I always ask, first, if they're registered to
11 vote. And then from there, I'll take it for whatever I
12 feel is necessary to get them interested into signing
13 the petition, so ---. And that's what I typically do.

14 SHORT BREAK TAKEN

15 BY ATTORNEY JOEL:

16 Q. Thank you. Mr. Jennings, just a couple questions.
17 In all of the states that you've worked, am I correct
18 that --- how to frame this --- you don't get every
19 person you approach does not sign your petition; is
20 that correct?

21 A. Of course not. Most people don't sign it.

22 Q. And that's happened to you in all of the states
23 you've collected; correct?

24 A. Of course. You're right. I really have to like
25 fight for my signatures a lot of times. And like I

1 said, a lot of it is built off trust on first
2 impression. So it's definitely not that easy. It's
3 not as easy as it seems, at least. Plus, I get a lot
4 of signatures 'cause I work like 18 hours a day,
5 sometimes. And I'm willing to put in that kind of
6 work. And that's why it's like I tell you.

7 Q. When you were in Pennsylvania any of those times
8 collecting signatures, I'm assuming that that at least
9 some of those collections required you to have a notary
10 to have the signatures notarized?

11 A. Yes.

12 Q. And am I correct that if you were required to get
13 a notarization, you were able to do that?

14 A. Yes. And in the times that I did not, at least
15 for the first time, I did not have a notary then I
16 cannot work. And that's how it was.

17 Q. And for some of the times that you've collected in
18 Pennsylvania, did you have a Pennsylvania resident
19 coming along with you to witness the signatures?

20 A. Yes, I have to.

21 Q. And how did that work out?

22 A. I mean, that was probably one of the most
23 aggravating things about it. Now that I'm speaking
24 with you, I realize now I forgot to mention Connecticut
25 and I don't know if I worked for --- I'm trying to

1 recall because I worked for Connecticut also. They
2 required witnesses also in Connecticut. I believe I
3 worked on the Alex Arsenault when I was in Connecticut
4 which I just forgot to tell you. But somehow, I missed
5 that one. And I believe that was when I first left
6 Pittsburgh. Yeah.

7 When I first left Pittsburgh in the wintertime, I
8 went to Connecticut before going back to Los Angeles.
9 That was before going back to Los Angeles.

10 Q. Who did you collect for ---? And was that working
11 for Alex Arsenault?

12 A. I was working for Alex Arsenault also.

13 Q. And who did you collect signatures for when you
14 were in Connecticut?

15 A. When I was in Connecticut, I believe it was for
16 Rocky De La Fuente and I believe it was for only Rocky
17 De La Fuente. And that's just the best that I can
18 recall.

19 Q. Do you remember how many signatures you collected
20 in Connecticut for Rocky?

21 A. I want to say 900, but I'm not sure.

22 Q. How long were you in Connecticut for?

23 A. I believe I was in Connecticut for like three and
24 a half weeks or so.

25 Q. Did you move about and go to different locations

1 within Connecticut?

2 A. For the most part, I had only worked in the New
3 Haven area. I don't recall actually working in
4 Hartford. I know that I had to go there sometimes but
5 I believe I had only worked in New Haven.

6 Q. Did you stay in different hotels in the New Haven
7 area?

8 A. Yes.

9 Q. So if I understand correctly, you went from
10 Pennsylvania directly to Connecticut and then from
11 Connecticut, directly back out to Los Angeles?

12 A. Yes.

13 Q. Thank you. And it's getting back --- so the
14 notary --- you were able to get the affidavit's
15 notarized, is that correct, when you were in
16 Pennsylvania?

17 A. Yes.

18 Q. I think that's all I have. Mr. Rossi may have
19 some questions for you and that may spark a few more
20 questions from me. But at this point, I'm finished.
21 Thank you. I appreciate you calling in.

22 A. All right. Thank you.

23 CROSS EXAMINATION

24 BY ATTORNEY ROSSI:

25 Q. Hey, Mike, this is Paul. How are you doing?

1 A. Hi. I'm doing okay.

2 Q. I guess I should get to say good evening instead
3 of good afternoon.

4 A. It already is kind of late here, but it's okay.

5 Q. Okay. You noted that in several states, when you
6 were working in parking lots, that police would harass
7 you or people would threaten to call the police on you;
8 is that correct?

9 A. Yes. They gave me a very hard time. And in
10 Chicago, there was one cop in particular who just
11 really tried to get under my skin. But yes, I had a
12 hard time in the parking lots for sure. That was
13 pretty much in almost every state, though.

14 Q. Did you have any such incidents in Pennsylvania?

15 A. I did have a few interactions with the police, but
16 for the most part, in Pennsylvania they were --- I
17 would aim to resolve it. You know, by just going to
18 another location. Yeah, it was very hard in
19 Pennsylvania, also because I had to hop around a lot.

20 Q. So you had to move around from location to
21 location?

22 A. Yes. And of course, when that happens, it
23 minimizes the amount of signatures that I can get
24 because I'm wasting time going from one spot to another
25 spot. I likely had a witness or whatever. It's not so

1 bad if she suggests that just go inside the clubs,
2 then.

3 Actually, that's what we did at one point because
4 they have, like, these bars that are open, I guess,
5 like, in the daytime, also. And so this is one of my
6 witnesses, because she's a much older lady. But she
7 told me to just take her advice, and then I did and
8 ironically, it worked for the latter part that I was
9 there in the wintertime.

10 So we would just go from, you know --- inside of
11 clubs, she would talk to the security guard, like,
12 flirt with the security guard. Then we would just have
13 to go inside to collect signatures.

14 Q. In response to one of Mr. Joel's last questions,
15 where you started talking about Connecticut, you raised
16 the intake witness here in Pennsylvania. And you said
17 that was one of your most aggravating aspects of
18 circulating in Pennsylvania. Can you expound on that,
19 please?

20 A. I mean, one of those aggravating things number
21 one, they don't really want to --- they want the money
22 of course but they --- a lot of my witnesses, they did
23 not work to work. And it didn't matter about the pay
24 stub they did not want to work. They would hinder my
25 efforts. They would give off negative energy out in

1 the field sometimes and it's my opinion it would turn
2 people away. And second of all and most importantly,
3 is that if they cannot work, I could not work. And for
4 me, that was a killer because for me I was never really
5 certain if I could work or not. Because if they do not
6 show up for work they're not going to work and because
7 they quit work early and I was having a good day then
8 it was my numbers because I can't work anymore 'cause
9 they're leaving.

10 Q. So you lost signatures because you didn't have a
11 witness available?

12 A. That happened a few days, yes.

13 Q. Were there days that you couldn't work because
14 there was no witnesses?

15 A. There was days that I could not work because there
16 was no witnesses, yes. Like, I did not have a witness
17 or my witness would cancel and then I could not work.

18 Q. Wasn't there anybody --- strike that.

19 You circulated in the Pittsburgh area; is that
20 correct?

21 A. Yes.

22 Q. Do you know anybody, personally, in Pittsburgh
23 that you could call to be a witness?

24 A. I mean my closest one, I guess, was Jevron
25 (phonetic). I know Justin (phonetic). I had a witness

1 named Charles Ostoe (phonetic) at times, Collette
2 (phonetic) of course. I'm kind of picky so I went to a
3 location day by day. There were times when they let me
4 down and I was hardly working, you know. I have their
5 phone numbers.

6 ATTORNEY RADZIEWICZ:

7 Excuse me, Mr. Jennings.

8 ATTORNEY JOEL:

9 Mr. Jennings, can you repeat that and
10 speak up? You broke up a little bit there.

11 BY ATTORNEY ROSSI:

12 A. Okay. Sorry. I have the phone numbers. Yes. I
13 have the phone numbers somewhere. I have Javron's
14 phone number. He was my witness. Justin's phone
15 number, he was my witness. Collette, she was my
16 witness but it ended very badly with her. Charles
17 (phonetic) was my witness also. We always had to find
18 more witnesses in case they were to cancel.

19 Q. And how did you find them?

20 A. Trent found them for me.

21 Q. But despite having four or five witnesses
22 available, it's your testimony that you were not able
23 to work as long as you wanted to work?

24 A. Right. I was lucky to even get what I got because
25 if I dare say that I want to work later, then they

1 could cancel the next day and it happened in the past.
2 You know, I would say well tomorrow can we work? Like,
3 you know what, as a matter of fact, I don't want to
4 work anything tomorrow. And so I was almost to the
5 point where I was scared to ask for more.

6 Q. Can you repeat that? I didn't understand that.
7 You're getting some feedback. You what?

8 A. I was scared to ask for more because in the past,
9 if they work a little bit of hours one day and then I
10 ask them to work more hours the next day, like in a
11 nice, friendly way. Like, you know what? It would be
12 a huge help for me if you could work like 12 hours
13 tomorrow. Then, they would get upset in the past and
14 then they would not work at all the next day, basically
15 because I asked to work more hours.

16 Q. And is it your testimony, you'd like to work 18
17 hours a day if possible?

18 A. Yes.

19 ATTORNEY ROSSI:

20 Okay. I have no further questions.

21 SHORT BREAK TAKEN

22 REDIRECT EXAMINATION

23 BY ATTORNEY JOEL:

24 Q. I think you testified something about some witness
25 who helped you get into a bar. What was her name?

1 A. Her name was Collette.

2 Q. Collette.

3 A. And the reason why we got inside bars was because
4 we had --- I mean, she had a better connection than I
5 because she was much older. So I guess they felt more
6 trust with her. But at the same time, it was very hard
7 in Pennsylvania. With all those fails we would either
8 go --- she would try to talk to other managers in slow
9 traffic stores or we would go inside bars, and that's
10 what we did sometimes, also.

11 Q. Let me ask you this. Is it your understanding
12 that when you were collecting signatures for Rocky De
13 La Fuente as a democrat in Pennsylvania or Ted Cruz as
14 a republican in Pennsylvania, you needed to have a
15 witness with you?

16 A. Yes.

17 Q. Is it your understanding that when you were
18 collecting for Rocky De La Fuente as a democrat in
19 Pennsylvania and Ted Cruz as a republican in
20 Pennsylvania, you needed to have the affidavit of the
21 witness --- of the circulator notarized?

22 A. Yes. And if I'm not mistaken, the second time I
23 went to Pennsylvania, we did not have to have that to
24 the best of my knowledge. But I know for the first
25 time for sure, we definitely had to have the witnesses

1 in everything.

2 Q. And is it also your understanding when you were
3 collecting signatures for Rocky De La Fuente as a
4 democrat and Ted Cruz as a republican in Pennsylvania,
5 you had to make sure that whoever signed your petition
6 hadn't already signed a petition for a competing
7 candidate?

8 A. Yes. At least for the first time, for certain.
9 And then, the second time, I believe it was the same
10 way also.

11 Q. And notwithstanding that, you were still able to
12 collect signatures in Pennsylvania for Rocky De La
13 Fuente as a democrat and Ted Cruz as a republican;
14 correct?

15 A. Correct.

16 Q. And you were still able to approach people and
17 talk to them about what you were doing and what you
18 wanted them to do signing the petitions; correct?

19 A. Correct. And I asked them if they were registered
20 to vote and is the first time signing for this person.
21 I asked them that, also. And there was the one for,
22 you know, it's my first time signing.

23 ATTORNEY JOEL:

24 Okay. That's all I have. Thank you.

25 * * DEPOSITION CONCLUDED AT 2:30 P.M.* *

1 COMMONWEALTH OF PENNSYLVANIA)

2 COUNTY OF BEDFORD)

3 CERTIFICATE

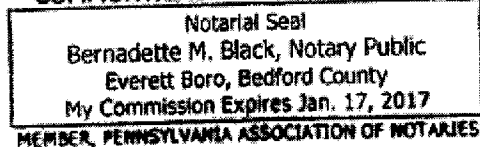
4 I, Bernadette M. Black, a Notary Public in
5 and for the Commonwealth of Pennsylvania, do hereby
6 certify:

7 That the foregoing proceedings, deposition of
8 Mike Jennings was reported by me on 09/29/2016 and
9 that I, Bernadette M. Black, read this transcript, and
10 that I attest that this transcript is a true and
11 accurate record of the proceeding.

12 That the witness was first duly sworn to
13 testify to the truth, the whole truth, and nothing but
14 the truth and that the foregoing deposition was taken
15 at the time and place stated herein.

16 I further certify that I am not a relative,
17 employee or attorney of any of the parties, nor a
18 relative or employee of counsel, and that I am in no
19 way interested directly or indirectly in this action.

20
21 COMMONWEALTH OF PENNSYLVANIA



Bernadette M. Black
BERNADETTE M. BLACK,

Court Reporter

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